

Buffey E. Klein
State Bar No. 24032515
Buffey.Klein@huschblackwell.com
HUSCH BLACKWELL LLP
1900 N. Pearl Street, Suite 1800
Dallas, Texas 75201
(214) 999-6152; fax (214) 999-6170
Lynn Hamilton Butler
Lynn.butler@huschblackwell.com
HUSCH BLACKWELL LLP
111 Congress Avenue, Suite 1400
Austin, Texas 78701
(512) 472-5456; fax (512) 479-1101
Attorneys for Alleon Capital Partners LLC

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS**

SHERMAN DIVISION IN	§	Jointly Administered
RE:	§	Under Case:
REMARKABLE	§	Case No. 23-42098
HEALTHCARE OF	§	Chapter 11
CARROLLTON LP,	§	Subchapter V
REMARKABLE	§	
HEALTHCARE OF	§	
DALLAS, LP,	§	
REMARKABLE	§	
HEALTHCARE OF FORT	§	
WORTH, LP,	§	
REMARKABLE	§	
HEALTHCARE OF	§	
SEGUIN, LP,	§	
REMARKABLE	§	
HEALTHCARE, LLC,	§	
DEBTORS.	§	
	§	
	§	

DECLARATION OF LADONNA DANIEL

I, LaDonna Daniel, declare pursuant to 28 U.S.C. § 1746 and under penalty of perjury that the following is true and correct:

1. I am over the age of 18 and am fully competent to make this declaration.

I have never been convicted of a crime of moral turpitude.

2. I, LaDonna Daniel, am the Director with Compass Medicare Billing LLC. I have personal knowledge of the facts set forth in this declaration, or have knowledge based upon my review of the documents maintained in the file in this matter, and, if called to do so, can testify competently thereto.

3. On January 9, 2024, Compass Medicare Billing LLC ("Compass") and the Remarkable Healthcare facilities entered into contracts to provide the following services:

- a. Provide Medicare monthly and discharge billing;
- b. Provide Medicaid weekly and discharge billing;
- c. Cross-bill to Medicaid and Third Party Insurance Companies as necessary, for claims that do not automatically crossover;
- d. Verify patient Medicare eligibility via Common Working File (CWF);
- e. Consult as to Policy & Procedures as they relate to Medicare;
- f. Assist with Medicare/Managed Care denials;
- g. File all primary and secondary private insurance claims;
- h. Batch bill flu shots and Covid shots on a yearly basis; and
- i. Confirm patient statements to are accurate in system and ready Facility for collection.

4. A true and correct copy of the contract is attached hereto as **Exhibit 1**.

5. Over the course of this engagement, Remarkable Healthcare has restricted the services Compass is able to provide to the facilities.

6. Based on my audit of the outstanding accounts receivable owed to the Remarkable Healthcare facilities, there is approximately \$4.3 million in potential receivables. Even this amount includes a number of receivables that are subject to error and inaccurate billing processes and will need correcting in order to realize any value.

Executed on this 18th day of March 2024, at Midwest, Oklahoma.



LaDonna Daniel

EXHIBIT A-1

EXHIBIT A-2